COMMENTS

FCC proposes expanding the WEA message length from 90 to 360 characters

1. How would this provide more detailed alert information to the public sufficient to motivate appropriate and swift action to save lives and protect property (Section III, A, 1, Paragraph 9)?
   Yes, the increase in character limits is warranted.
   The increase is needed to ensure the citizens receive *all* of the appropriate information warranted to ensure effective communication and accuracy of decisions. The increase in characters would allow governments the ability to specifically address concerns such as boil water notices that may include details on how to safely handle the concern. The increase could even allow governments the ability to give alternate directions to shelters in times where roads may be closed due to damage or traffic congestion.
2. How would this affect accessibility of messaging to people with disabilities, senior citizens, and persons with limited English proficiency (Section III, A, 1, Paragraph 10)?
   The increase in character limit should not affect vulnerable population(s) as the increase should give them the ability to fully understand the pertinent information that will be disseminated. The increase in character limit gives governments the ability to spell out terminology and advice that may not have been available under the 90 character limit, which in turn can help address the language barrier as well as the communication barrier among age differences.
3. How can we quantify the potential life-saving benefits of increasing the character length (Section III, A, 1, Paragraph 10)?
   At this point the increase is purely empirical in nature; yet, the increase can be quantified through surveys of residents in a compare and contrast of a 90 character message verse a message approaching the 360 character limit.
4. Is 360 characters the optimal maximum? What number of characters is necessary to provide detailed information about the emergency (Section III, A, 1, Paragraph 11)?
   The 360 character limit should be enough and should allow for *all* pertinent information to be passed. The 90 character limit was accurate; however, the limit was not substantial in certain messages. This means a limit of 360 should be more than enough.
5. Is it feasible for alert originators to provide both 90 character and 360 character messages to accommodate new and legacy implementations (Section III, A, 1, Paragraph 13)?
   Having to decipher between a 90 or 360 character messages to accommodate both new and legacy implementations could prove problematic and confusing to alert originators. This can be avoided however, by promoting the message to be displayed into several messages on legacy communications while one message on newer communications.

FCC proposes adding a new WEA category titled "Emergency Government Information" for non-emergency type messages (i.e. boil water, shelter locations)

1. How should the FCC define the "Emergency Government Information" category (Section III, A, 2, Paragraph 18)?
   Describing the "Emergency Government Information" category can become cumbersome and convoluted if not appropriately addressed. This new category is without a doubt appropriate; yet, the category needs to be defined. I believe the category should be defined by the terminology used within the paragraph as it states, "One or more actions to save lives and/or

safeguard property during an emergency." This terminology leaves the category broad and leaves the interpretation up to the government and their alert originators.

2. Would adding this category of alerts expand the alerting toolkit in a meaningful way (Section III, A, 2, Paragraph 18)?
   Yes.
   Not only would this give governments the ability to target specific audiences with pertinent information, it could quite possible save offices dollars as they could reduce their mass call notification message minutes with their providers as "boil water notices" could potentially be covered under the new category. This new category could also promote safety in situations like *active shooters* as issues of avoidance warning could be disseminated to those nearby or a shelter in place advisory to those within the designated *danger zone.*
3. Should this category be restricted to be used in conjunction with an Imminent Threat alert, or allowed to be issued as standalone (Section III, A, 2, Paragraph 19)?
   This category should be used as a standalone because of the unique nature behind the category. Not everything is an imminent threat; the threat could be minimal or potentially imminent or the threat could even be adverse reaction if action is not taken during times of non-emergency.
4. What kind of guidelines can be applied to this alert category (Section III, A, 2, Paragraph 19)?
   The guidelines that should be in place are to ensure only appropriate alert originators have access as well as the message must be used to protect lives and/or safeguard property only.
5. Should this category of alerts be restricted to certain "appropriate agencies" (Section III, A, 2, Paragraph 19)?
   Yes.
   However, the appropriate agencies need to be all levels of government to include local offices of government. The local office, in theory, would be the ones who would use the emergency government information category more frequently as it could be used to inform residents of boil water notices or bomb threats.
6. Would adding this category desensitize the public to other alert categories (Section III, A, 2, Paragraph 19)?
   No.
   Including this category is paramount to ensuring a more resilient community across the broad range of emergencies. This category, however, must be used appropriately and monitored to ensure only credible information is pushed through to the public to avoid the potential for residents becoming desensitized.
7. Should this category be an "opt-in" or "opt-out" category (Section III, A, 2, Paragraph 21)?
   This option should be treated as the other alerts; required on all devices unless otherwise "opting-out."
8. Should WEA be broken out into other additional categories (i.e. Severe Weather Alerts, Local Alerts), and if so, how would they be different from Presidential, AMBER, Imminent Threat, or Emergency Government Information categories (Section III, A, 2, Paragraph 22)?
   This particular section is tricky as these categories should, in theory, fall under the overarching theme of emergency government information. I believe the government information category should not be subcategorized and the discretion of information disseminated shall be put in the hands of the local emergency manager alert originators.

FCC proposes allowing URLs and telephone numbers in WEA messages which were previously prohibited

1. Would including URLs and phone numbers in WEA messages advance public safety (Section III, A, 3, Paragraph 25)?
   Yes.
   Including links could prove paramount to community resiliency as the link could provide further information in emergency situations or even accurately depict the situations through pictures or twitter messages.
2. Does the public currently turn to the internet for additional information when they receive a WEA message (Section III, A, 3, Paragraph 25)?
   This answer is based on my own observations and my own actions
   Yes.
   People will turn to the internet to find further information and because of the lack of internet validity; the ability to include OUR designated URL or further information would prove, once again, paramount to ensuring the community under emergency is receiving the validated, accurate and up to date important information.
3. Would including URLs and phone numbers improve alert quality and accessibility (Section III, A, 3, Paragraph 26)?
   Yes.
   This would give the residents the chance to investigate information further and in turn receive the information WE want them to receive. The phone numbers are also important as this would give our county the ability to tell residents to call 2-1-1 for pertinent information pertaining to Brevard residents during an emergency. This number could be pre-loaded with important messaging to be given to the public.
4. Would including URLs and phone numbers reduce "milling" behavior by directing the public to specific information (Section III, A, 3, Paragraph 26)?
   Yes.
   See answer to 1, 2, and 3.
5. Would including URLs and phone numbers enhance AMBER alerts (Section III, A, 3, Paragraph 27)?
   I have no valid opinion on this matter; yet, if URLs and numbers would improve the others, why would it not improve AMBER alerts.
6. Would including URLs and phone numbers enhance accessibility to those with disabilities, senior citizens, and persons with limited English proficiency (Section III, A, 3, Paragraph 29)?
   Yes.
   Including the URLs/phone number capability would enhance communication abilities in order to better reach vulnerable populations. This would provide those with disabilities, senior citizens, and persons with limited English proficiency ways to gather additional appropriate information.
7. Currently WEA supports text only. Would the addition of images, maps, or other multi-media content in the WEA message significantly enhance the usefulness of the system (Section III, A, 3, Paragraph 30)?
   Yes.
   The more information that can be provided, the better the message can be communicated. Images would allow the emergency management agency to accurately depict their information

and allow the receiver to determine their own action in regards to the emergency. The ability to show a map of traffic congestion or the area of a boil water zone could drastically improve resident familiarity and adherence to the emergency management community.

FCC proposes including multilingual WEA messages

1. Would the addition of multilingual WEA provide any benefits (Section III, A, 4, Paragraph 32)?
   Yes.
   With the populations of those who may not at all or may speak infrequently English, there is a need to reach those individuals in their native language. Many studies (Hurricane Katrina, for example) have shown that evacuation orders have gone unheeded due to the fact that non-English speaking individuals were left without clear direction as the language barrier was not addressed appropriately.

FCC proposes improvements to WEA geo-targeting of alerts

1. FCC proposes requiring cell carriers to transmit alerts to the polygon level (or closest approximation) as opposed to the county level, and therefore seeks comments on this proposal and rationale (Section III, B, Paragraph 37).
   Yes!
   Accurate GEO-Coding is vital to reducing residents becoming desensitized to emergency information.
2. FCC is considering other approaches would improve geo-targeting (i.e. device-based geo-targeting, cell sectorization), and seeks comments on potential benefits to emergency managers. How would more accurate geo-targeting minimize over-alerting, reduce alert fatigue, and minimize problems of bleed-over (Section III, B, Paragraph 41)?
   The increase in geo-coding measures gives emergency managers the ability to only inform those residents affected and in turn reduce citizens potentially becoming desensitized. The accuracy of geo-coding could be used to target those individuals who approach a beach on a day where rip currents are severely dangerous. This small, yet informative information message could lower the risk for rip-current related deaths.

FCC proposes inclusion of local WEA test codes

1. FCC proposes allowing state and local testing. The approach defines immediate delivery of the test message (vs allowing cell carriers to delay it up to 24 hours). The approach also provides for a public opt-in (the public would have to enable the test code on their phone) to receive the test message vs opt-out. Please comment on this approach (Section III, C, 1, Paragraph 47).
   This testing is needed and the 24-hr delay needs to be removed. The testing needs to be available to ensure alert originators have the experience to launch a message in times of *real* emergency, as well as to test the accuracy of the message. The opt-in for testing is appropriate for residents.
2. There are two alternative approaches being considered, a) delaying test messages up to 24 hours, and b) making public receipt of test messages an opt-out option. Please comment on these alternatives (Section III, C, 1, Paragraph 51).
   See answer 1.
3. How often should state and local agencies be allowed to test (Section III, C, 1, Paragraph 49)?

Testing should be allowed twice a year. For example, Florida governments should use the testing once prior to Hurricane Season and once prior to the start of their winter hazards.

4. What public safety benefits would come from state and local testing (Section III, C, 1, Paragraph 50)?
   The benefits would be to ensure the system is efficient prior to a *real* emergency as well as to ensure local and state office personnel are experienced in actively submitting an alert message.

FCC proposes requiring cell carriers to log alerts and provide reports

1. FCC proposes requiring cell carriers to generate monthly system and performance statistics reports based on category of alert, alert originator, alert area, and other alerting attributes (Section III, C, 2, Paragraph 56). FCC seeks comment on whether cell carriers should report on alert delivery latency, accuracy of geo-targeting, and quality of public response (Section III, C, 2, Paragraph 57). Please comment on the extent to which this reporting would benefit alert originators.
   Yes.
   A report on all of the above is warranted to ensure system efficiency and accuracy. These statistical reports are used with regards to mass call notification systems, so emergency alerts should not be treated differently.
2. How should this reporting information be shared? Should it be restricted (Section III, C, 2, Paragraph 58)?
   The reporting information should be shared across the CMS and the alert originators. There would be no problem in FEMA and FCC having access as well, yet the reports should not be shared across local/state boundaries.